



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278*

January 13, 2025

BY ECF

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

**Re: United States v. Farhane, 05 Cr. 673 (LAP)
United States v. Farhane, 18 Civ. 11973 (LAP)**

Dear Judge Preska:

The Government respectfully submits this joint letter responding to the Court's Order directing the parties to meet and confer and to propose a schedule. Last week and this week, the parties met and conferred telephonically to discuss potential next steps. Based on discussions thus far—which have been frank and productive—the parties have not reached agreement as to scheduling or the scope of further litigation in this case.

However, the parties believe that, if given additional time to confer, the parties may reach agreement on some issues, thereby narrowing the disputes that the Court would need to resolve. Accordingly, the parties respectfully propose to file a letter by January 27, 2025, setting forth the areas of agreement and any remaining areas of disagreement.

Respectfully submitted,

EDWARD Y. KIM
Acting United States Attorney for the
Southern District of New York

by: /s/ Jun Xiang
Jun Xiang
Assistant United States Attorney
(212) 637-2289

CC:
Counsel for Abderrahmane Farhane